

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ANDREW L. COLBORN,

Plaintiff,

Civil No. 19-CV-484-BHL

v.

NETFLIX, INC.; CHROME MEDIA LLC,
F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,

Defendants.

STIPULATION RE [PROPOSED] PROTECTIVE ORDER

The undersigned stipulate to entry of the [Proposed] Protective Order provided herewith as **Exhibit A**. The parties request that the Court enter the [Proposed] Protective Order to expedite the exchange of discovery between the parties in this action, and in recognition that Defendants Netflix, Inc., Chrome Media LLC f/k/a Synthesis Films LLC, Laura Ricciardi, and Moira Demos believe that discovery in this action will involve production of confidential, proprietary and/or private information, documents, data and other materials, for which special protection from dissemination and from use for any purpose other than prosecuting this litigation may be warranted. Defendants anticipate such information will include financial information, including the confidential terms of business contracts, as well as additional technical and commercially sensitive information and materials that could cause Defendants competitive and other harm if publicly disseminated. *See, e.g., Cobra Eng'g Inc. v. H-D USA LLC*, 2018 U.S. Dist. LEXIS 109719, *2-3 (E.D. Wisc. July 2, 2018) (“The parties have requested the protective order in this case in good faith; they seek the order so that they might freely exchange sensitive information. . . This includes technical, financial, and commercial information from the parties

themselves and third parties. . . The Court thus finds that there is good cause to issue the requested protective order.”) (citations omitted); *accord Clark Tech. LLC v. Corncob Inc.*, 2019 U.S. Dist. LEXIS 5196 (E.D. Wisc. Jan. 11, 2019).

The [Proposed] Protective Order is identical to the Eastern District of Wisconsin’s model protective order.

Dated: August 19, 2021

Respectfully submitted,

s/ April Rockstead Barker

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s/ James A. Friedman

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Dated: August 19, 2021

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